

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

IN RE JACKSON WATER CASES,

No. 3:23-cv-00614-CWR LGI
(Main Docket – All Plaintiffs)

Hon. Carlton W. Reeves,
U.S. District Judge

Hon. LaKeysha Greer Isaac,
U.S. Magistrate Judge

DECLARATION OF COREY M. STERN, ESQ.

Pursuant to 28 U.S.C. § 1746, I, Corey M. Stern, hereby declare as follows:

1. I am a partner with the law firm Levy Konigsberg, LLP.
2. I submit this Declaration in conjunction with Plaintiffs' Response in Opposition to Defendants' motion for entry of a *Lone Pine* order.
3. I have been practicing law for twenty (20) years.
4. Over the course of my career, I have represented thousands of lead-poisoned, minor plaintiffs, across the United States in civil litigation.
5. My law firm currently represents more than two-thousand four hundred (2,400) minors as Plaintiffs/Claimants in this litigation.
6. As part of, and in conjunction with my practice, I am responsible for selection of expert witnesses and for negotiating rates with experts for their work.
7. Throughout the United States, in this type of litigation, plaintiffs are

responsible for payment of costs and fees to experts.

8. Here, Plaintiffs/Claimants are ultimately responsible for payment of costs and fees to experts for work undertaken in their cases.

9. To comply with Defendants' proposed *Lone Pine* order, I believe – based on decades of experience in these types of cases – that it will cost approximately thirty-thousand dollars (\$30,000.00) per Plaintiff/Claimant in expert costs and fees, for a total of approximately seventy-two million dollars (\$72,000,000.00).

10. I believe – based on decades of experience in these types of cases – it will take four (4) to six (6) years to complete the work required to comply with Defendants' proposed *Lone Pine* order.

Respectfully submitted, this the 31st day of October, 2023.

LEVY KONIGSBERG, LLP

/s/ COREY M. STERN

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